

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
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<p>In re:</p> <p><b>LTL MANAGEMENT LLC,<sup>1</sup></b></p> <p>Debtor.</p>	<p>Chapter 11</p> <p>Case No.: 23-12825 (MBK)</p> <p>Honorable Michael B. Kaplan</p>

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**NOTICE OF MOTION OF THE OFFICIAL COMMITTEE OF TALC CLAIMANTS  
(A) FOR AUTHORITY TO FILE UNDER SEAL THE REDACTED PORTIONS OF AN  
EXHIBIT OF THE TCC’S MOTION TO COMPEL DEPOSITION TESTIMONY OF  
ADAM PULASKI, AND (B) FOR OTHER RELATED RELIEF**

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**PLEASE TAKE NOTICE** that the Official Committee of Talc Claimants (the “**TCC**” or the “Committee”) in the above-captioned case of LTL Management, LLC (the “Debtor” or “**LTL**”), by and through the Committee’s proposed counsel, will move, on an expedited basis, before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the United States Bankruptcy Court for the District of New Jersey, Trenton Vicinage, at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8, pursuant to 11 U.S.C. § 107(b), Fed. R. Bankr. P. 9018 and D.N.J. LBR 9018-1 (the “**Motion to Seal**”) for entry of an order, substantially in the form submitted herewith, (A) for authority to file under seal the redacted portions of an exhibit to the TCC’s Motion to Compel Deposition Testimony of Adam Pulaski (among other related relief) (the “**Motion to Compel**”), filed substantially contemporaneously herewith,<sup>2</sup> and (B) granting the Committee such other and further relief as the Court deems necessary, appropriate and consistent with the goals of the Motion to Seal.

**PLEASE TAKE FURTHER NOTICE** that, substantially contemporaneously with the filing of this Motion, the TCC has filed an Application for Order Shortening Time and Certain Other Relief (the “Scheduling Application”) requesting that the hearing on the Motion be

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<sup>2</sup> A redacted version of Exhibit 1 to the Motion to Compel has been filed immediately prior to the filing of this Motion to Seal. An unredacted version of Exhibit 1 to the Motion to Compel is being filed immediately after the filing of this Motion to Seal in accordance with this Court’s procedures for electronically requesting that a document be sealed (*see* [Process to Electronically Request that a Document be Sealed | United States Bankruptcy Court - District of New Jersey \(uscourts.gov\)](https://www.uscourts.gov/uscourts/district-of-new-jersey/electronic-filing-process)).

scheduled for June 6, 2023. **TAKE NOTE that the order entered with respect to the Scheduling Application will, among other things, specify the date and time of the hearing on the Motion.**

**PLEASE TAKE FURTHER NOTICE** that, the TCC shall rely upon the application filed herewith in support of the relief sought by this Motion, and that no brief is being filed herewith since the legal basis upon which relief should be granted is set forth in the supporting application filed with the Motion.

**PLEASE TAKE FURTHER NOTICE** that, oral argument is requested, unless the Court directs that no oral argument would be necessary.

**PLEASE TAKE FURTHER NOTICE**, that all objections, if any, must be made accordance with the Court's order entered with respect to the Scheduling Application. If the order entered with respect to the Scheduling Application directs that written objections be filed, then in accordance with D.N.J. LBR 9013-2(a)(2), written objections shall be filed with the Clerk of the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608, and a copy thereof must simultaneously be served upon GENOVA BURNS, LLC., Attn: Daniel M. Stolz, Esq., 110 Allen Road, Suite 304, Basking Ridge, New Jersey 07920, so they are received by the deadline set forth in the Court's order entered with respect to the Scheduling Application.

**PLEASE TAKE FURTHER NOTICE** that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Dated: June 2, 2023

**GENOVA BURNS LLC**

By: /s/ Daniel M. Stolz

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